Attachment ESJ-7

AT&T-VZ NY
Data Responses

Case: 02-C-1425
AT&T
Date of Request: October 9, 2003
Respondent: VZ Panel

ATT-VZ-23	Refer to Verizon's response to discovery question ATT-VZ-7PS, wherein Verizon indicates that it has a number of "Auto MDF (Robotic Controlled Cross Connection)" devices deployed throughout New York. Please explain the following with regard to this "auto MDF" capability: a. Do these "Auto MDF (Robotic Controlled Cross Connection)" devices totally eliminate the need for frame technicians to run and remove cross connections on the frame in the central offices where they are deployed? b. How long does it take this device to perform a single hot cut connection and associated disconnect? c. What triggers the automated device to allow it to know what connections to make and what connections to remove? Is it fully automated (i.e. does it get its instructions from the service order process) or does it need to be programmed manually? d. What factors does Verizon consider in determining in which central offices to deploy the devices? Without limiting the foregoing question, please explain whether the size of the central office and whether the central office is manned or unmanned are among the factors that Verizon considers in determining in what central offices to deploy the devices. Please describe any other factors that explain the central offices in which Verizon has deployed the devices. e. What is Verizon's plan for fully deploying this capability throughout its footprint in New York?

RESPONSE:

(a) Auto MDFs, where deployed, eliminate the need for technicians to connect and disconnect jumpers on the frame under the following conditions:

- Auto MDF has been fully installed and pre-wired to the existing MDF for all available cable pair and office equipment connections.

- Cable pair side and network side connections for the required assignment must be existing and terminated at the Auto-MDF.

- Required cross connect points at the Auto MDF must be available in the element management system for assignment and the path through the Auto MDF matrix must be verified.

Also, it should be noted that:

- Special services are not typically terminated on the Auto-MDF.

- Loops assigned to integrated digital loop carrier (IDLC) systems are not available for metallic cross-connection at the Auto MDF.

(b) Auto MDFs deployed in New York are not currently used to perform hot cut connections in view of the fact that deployment is generally limited to small unstaffed central offices, and that deployment to date has been in offices with no collocation. For general applications, it typically takes less than approximately 2 minutes to complete an Auto MDF connection (or associated disconnect) once the order is forwarded to the Auto MDF from the NHC ControlPoint Connection Management System.

(c) Auto MDFs in New York are currently controlled by an NHC ControlPoint Connection Management System... This element management system communicates with the Auto MDF via the CMS remote unit located with each Auto MDF device. Currently, a technician must take the information from the Frame Order Management System (FOMS) and manually input the required assignment data into the centralized CMS workstation. Verizon is currently working with the vendor to test an interface that will automate this process in the future.

(d) The factors that Verizon considers when deploying Auto MDFs include the size of the central office, whether the office is "staffed" or "unstaffed", and the geographic location of the office with respect to other existing or planned Auto MDF offices. Verizon has typically deployed Auto MDFs in small "unstaffed" offices with less than 4000 lines, and where an opportunity exists to cluster with other Auto MDF offices. Central office surveys are then required to verify that other factors such as floor space and power would exist to accommodate a new Auto MDF cabinet. Refer to Network Planning Document "NP-AL-2002-106 Issue #1, September 2002" provided in response to AT&T-VZ-24, part (e).

(e) At the present time, Verizon has no plans for fully deploying this capability in all central offices within its footprint in NY.

Case: 02-C-1425
AT&T
Date of Request: November 3, 2003
Respondent: VZ Panel

ATT-VZ-37	Regarding Verizon's newly proposed "batch hot cut process" please provide the following details: (a) What does Verizon anticipate the "critical mass" will be by the central office types indicated below: (i) COs' that are unstaffed with less than 5,000 lines, (ii) COs that are unstaffed with >5,000 lines, (iii) COs that are staffed with <10,000 lines, (iv) COs that are staffed with between 10,000 and 40,000 lines, (v) COs that are staffed with 40,000 – 80,000 lines and (vi) CO with >80,000 lines. (b) What happens after day 35 if the "critical mass" is not met? (c) What happens after day 35 if the hot cut is not completed? (d) With respect to number porting and Verizon's responsibility to notify NPAC, please answer the following questions: (i) How and when will Verizon notify the CLEC that each cut was completed and that the customer's number has been ported? (ii) What processes and procedures does Verizon propose for reconciling any misunderstandings or disagreements between the CLEC, Verizon and NPAC should they arise with respect to any particular ported number? Please specify the individuals or organizations within each entity to become involved in such situations. (iii) Given the responsibility that Verizon is assuming to notify NAPC, does Verizon propose that CLECs have any recourse or remedy in the event that Verizon fails to perform its responsibilities. If so, please describe. If not, please explain why not.

	(e) How will Verizon handle its "frame crew flexibility" (see page 37, line 18) to insure that multi-line customers are cutover as one to minimize the impact to service (e.g. hunting arrangements)? (f) How will Verizon treat an order to change an existing customer's UNE-P service when there is a pending batch hot cut order during the 35 day interval? Specifically, what changes can be made and what charges, if any, will apply? Please address at least two situations: (i) A newly acquired customer of CLEC A seeks to change one or more features on his/her service during the holding period; (ii) A newly acquired customer of CLEC A seeks to change his/her service during the holding period to CLEC B. (g) Where is Verizon trialing this process? (see page 40, line 3-5) (h) What CLEC is participating in this trial? (i) Please provide a time line for when preparations began, what preparations have been completed and the planned milestones for completion of the trial? (j) Please provide specifics on how this trial is being conducted. (k) Please describe in detail what Verizon means when it refers to a "UNE-P like arrangement" (Initial Panel Testimony, p. 38, lines 13-17). Please include in your answer the following: (i) In what way it is the same as, and in what way it is different from, UNE-P as currently provided by Verizon. (ii) How long Verizon intends to maintain the prices indicated at p. 38, lines 15-17, for such service. (iii) What factors would cause Verizon to change the prices for such service.

RESPONSE:

(a) The total number of lines per office has little, if any, bearing on the 'Critical Mass'. Verizon will take into account the activity associated with Platform lines (i.e., inward and migrations) in setting initial 'Batch Limits' for each central office. These initial 'Batch Limits' can be as few as one line in a Central Office within the 35 business days if there is no demand, or as many as needed in order to cut over all of the requested Batch Hot Cuts within the proposed interval. Based on the scalability study, the busiest offices will require between 100 and 150 lines cut per day. However, Verizon will need to retain the flexibility to change these numbers over time based upon demand.

(b) Assuming that there are no CLEC issues, all lines will be migrated on or before day 35 whether or not the 'Critical Mass' has been met.

(c) Assuming that there are no CLEC issues, all lines will be migrated on or before day 35 whether or not the 'Critical Mass' has been met.

(d) (i) The CLEC will be able to view the status of their orders in WPTS throughout the process. Specifically, once the cut is completed and the port has been activated WPTS will be updated to show (on a line by line basis) which orders have been completed and which, if any, have problems. Also, the CLEC will receive the same PCN and BCN notifiers that they receive today on all Hot Cut LSR's submitted.

(ii) As they are today, the RCCC will be the controlling organization within Verizon, should any problems arise with the Batch Hot Cut. Verizon is in the process of determining the best processes and procedures to handle porting problems.

(iii) Verizon will only have the ability to activate the port with NPAC. However, this does not preclude the CLEC's ability to view, change and activate the port. Therefore, should there be a problem in the porting of the line, the CLEC will be able to access their existing interface with the NPAC database as it does today. Verizon plans to enter into an agreement with the CLECs that adopt this process that would govern the rights and obligations arising out of the port authorization.

(e) The TRO Batch Hot Cut process is designed to handle Mass Market migrations. Based on the FCC's definitions of Mass Market, it is unlikely that there will be a significant number of "multi-line customers" with services spread throughout the CO (i.e., customer's lines are served out of a wide range of cables.) This is to say that most small hunt-groups will be closely located on the MDF (i.e., customer's lines are served out of a relatively tight cable count), therefore the lines will most likely be cut in a contiguous fashion. Also, while Verizon will be creating Batches based on line count, no batch will contain a partial order. Both of these will minimize the impact to service.

(f) (i) Since the customer can be migrated to a UNE-P service under the same guidelines as today, i.e. the CLEC can specify what types of features they would like on the line, the customer will not be able to make any changes to their account while the UNE-L order is pending. However, the CLEC has the option to cancel the pending LSR migration to UNE-L and submit a change order and then resubmitting a migration to UNE-L LSR.

(ii) This will be handled the same way that such requests are handled today. If there is a pending order to migrate the customer to UNE-L (with CLEC A) and CLEC B submits a request to take over that account, that 2nd request will be referred back to CLEC B advising them that the customer has a pending migration with CLEC A. The customer would need to decide if they are going to maintain service with CLEC A or cancel that order and have CLEC B take over the account.

(g) The trial will be conducted in New York State.

(h) A complete list of trial participants has not yet been developed.

(i) It is not clear what the question means by "preparations." Verizon began thinking about a "batch" hot cut process and developing concepts for such a process after the Triennial Review Order was issued; as the concept began to take shape, we began more active development efforts. We are pursuing this product development in the Change Control workshops, LNPA working group and the industry as a whole in order to achieve full commercial implementation for the roll out of this product in early 3rd quarter 2004. For example, Verizon expects to be able to accept UNE-L orders by the end of November

2003 to start accumulating into 'Batches' via WPTS. External timelines are to be determined.

(j) CLEC's ultimately involved in the trial will be asked to submit LSR's that can be used to ensure that all aspects of the process work together to ensure that the end users are migrated with a minimal disruption to their service.

(k) (i) The product will provide the basic functionality currently provided by UNE-P, but it will not be offered subject to unbundling rules or other legal/regulatory requirements currently applicable to UNE-P, including TELRIC pricing.

(ii) No decision has been made on this issue.

(iii) No decision has been made on this issue.

Case: 02-C-1425
AT&T
Date of Request: November 3, 2003
Respondent: VZ Panel

ATT-VZ-38	Please reconcile Verizon's assumption of a non-flow through rate of 23% of all migration orders with Verizon's current performance of 99% flow through on all UNE orders that are flow through eligible, as indicated on NY CLEC Aggregate C2C Reports, OR-5-03-3000? Additionally, please reconcile Verizon's assumption of a non-flow through rate of 23% of all migration orders with Verizon's current performance of more than 94% on flow through for all orders received whether flow through eligible or not. *See*, NY CLEC Aggregate C2C Reports, OR-5-01-3000.

RESPONSE:

Because we are looking at data from an operational perspective and because the New York State Carrier-to-Carrier Guidelines do not further disaggregate UNE orders, Verizon utilized operational reports for August 2003 to calculate a non-flow through rate of 23%. This is for an operationally-defined subset of UNE loop orders and is provided in Exhibit III-A-P of Verizon New York's Wholesale Non-Recurring Cost Model.

The flow through rates used in the model are consistent with the NY C2C OR-5-01-3000, but provide a more conservative view than the C2C definition because the rates used in the model include additional orders such as queried orders and Verizon affiliate orders that would be excluded per the metric guidelines. The flow through rate that AT&T cites for OR-5-01-3000 is an aggregate calculation for all UNE and would include such things as digital loops, line-sharing, directory listing, and platform orders, which are excluded from the calculation utilized.

The flow through rate that AT&T cites for OR-5-03-3000, which is for achieved flow through, bears no relationship to the calculation utilized. OR-5-03 only takes into account orders that are flow through eligible under the C2c guidelines. Verizon cannot limit its actual hot cut orders to flow through eligible ones – it has to process the orders it is receives. So it is the actual flow through rate that is relevant to Verizon's costs rather than the achieved rate.

Case: 02-C-1425
AT&T
Date of Request: November 3, 2003
Respondent: VZ Panel

ATT-VZ-46S	Please indicate if any conditions for which orders would be created manually by Verizon (as in NMC task #4) would cause any future LSRs to also fallout. In other words, are there conditions for which Verizon corrects the CLEC's LSR and creates the service order manually, and for which the CLEC is not notified about the error condition, which notification would have allowed the CLEC to avoid future fallout.

RESPONSE:

Verizon will respond to this interrogatory on or before November 21, 2003.

SUPPLEMENTAL RESPONSE (11/17/03):
As a rule, there are no conditions for which orders would be created manually by Verizon (as in NMC task #4) that would cause any future LSRs to also fallout. The CLEC is always notified by the NMC about any error(s), which cause a manual order to be generated.

Case: 02-C-1425
AT&T
Date of Request: November 3, 2003
Respondent: VZ Panel

ATT-VZ-47	Please explain under what conditions Verizon will cancel the CLEC's LSR as expressed in NMC task #6. Please also explain why this task would not happen when the CLEC chooses the "Full-Mechanized Coordination Expedite" element.

RESPONSE:

NMC Task #6 refers to Verizon handling a CLEC request for a modification or cancellation to the LSR.

A "Full-Mechanized Coordination Expedite" is an additional charge which applies every time that a CLEC requests an expedited due date from the standard intervals. A request for an expedited due date is not applicable to the cancellation of a pending order.

In reviewing Exhibit III-A-P to prepare this response, it was discovered that the Company inadvertently put zeros in Column D in NMC Activities 6 and 7. These should have been set equal to the values in Column H, since the expedite surcharge reflects the difference in times associated with NMC Activities 2, 4 and 5. This correction will increase the Full-Mechanized Coordination Expedite by $5.25 per instance.

Case: 02-C-1425
AT&T
Date of Request: November 13, 2003
Respondent: VZ Panel

ATT-VZ-119	What are the hours of availability for the batch hot cut process (e.g., available on a 24/7 basis)?

RESPONSE:

As Verizon will be able to cut over lines included in a batch without specific coordination with the CLEC (as Verizon will send the final port notification to NPAC), we will be able to cut over such lines on a 24 by 7 basis subject to the availability of frame technicians.

However, to clarify our intent, once a CLEC is notified of the date on which a Batch Hot Cut is to be completed, there will be no designated cut over time similar to the FDT on a regular Hot Cut. Rather, the precise scheduling of the hot cut will be within Verizon's discretion. The CLEC will be notified through WPTS once the end user is migrated and the service has been ported onto the CLEC switch.

Case: 02-C-1425
AT&T
Date of Request: November13, 2003
Respondent: VZ Panel

ATT-VZ-132	What revised or new metrics does Verizon propose to introduce to measure the performance of the batch hot cut process?

RESPONSE:

Verizon has not completed its assessment of metric requirements in order to develop a specific metric proposal for the batch hot cut process. Verizon will be prepared to make such a proposal when appropriate at the Carrier Working Group collaborative.

Case: 02-C-1425
AT&T
Date of Request: November 13, 2003
Respondent: VZ Panel

ATT-VZ-135	Please describe in detail how the request for a connection using automated cross-connection devices is made. Specifically, is this request done manually over a data link by a Verizon technician or is the request generated automatically from Verizon's OSSs.

RESPONSE:

At the present time, there is no flow-through from a Verizon OSS to the NHC automated MDFs. The NHC ControlPoint Connection Management System (CMS), an element management system, resides in a regional provisioning center. It communicates with a CMS remote unit, located in each central office where the NHC ControlPoint automated MDF have been deployed. The remote units use a 10baseT Ethernet connection provisioned across Verizon's operations systems network in order to communicate with the CMS in the regional center. A technician must take the information from the Frame Order Management System (FOMS) and manually input the required assignment data into the centralized CMS workstation.

Case: 02-C-1425
AT&T
Date of Request: November 26, 2003
Respondent: VZ Panel

ATT-VZ-141	For central offices in which Verizon has already installed automatic distributing frames, what is Verizon's proposed provisioning interval for performing hot cuts?

RESPONSE:

(We assume that the term "interval" as used in this interrogatory refers to the installation or provisioning intervals such as those set forth in Section 5.5.3 of Verizon's Tariff PSC No. 10.) Currently, no special intervals apply to such offices, and Verizon has no immediate plans or proposals to differentiate offices on this basis for interval purposes.

Case: 02-C-1425
AT&T
Date of Request: November 26, 2003
Respondent: VZ Panel

ATT-VZ-150	Please state the maximum number of lines that a customer can have and still be eligible for inclusion in Verizon's batch hot cut process. Please also explain how, if customers with more than two lines may be included in this process, the process will work for such customers to ensure that all of the customer's lines will be cut in sequence (for example, to avoid interference with such service features as "hunting").

RESPONSE:

There is no limit to the number of lines that a customer can have and still be eligible for inclusion in Verizon's Batch Hot Cut Process. However, there can be no assurance under that process that the customer's lines will be cut in sequence, although Verizon will endeavor to accommodate CLEC concerns where it is reasonably possible to do so, particularly where a small number of lines are involved. If such sequential cutovers are important to the customer or the CLEC, one of the other hot cut processes will have to be utilized.

Case: 02-C-1425
AT&T
Date of Request: November 26, 2003
Respondent: VZ Panel

ATT-VZ-158	During the November 21 technical conference, there occurred a discussion of using a "SMARTS CLOCK" method for determining the due date for a batch job in lieu of a maximum waiting period. Please provide details as to whether Verizon is actually developing this capability and, if so, when will it be subjected to trial and ultimately put in service.

RESPONSE:

Verizon anticipates tracking data from the Batch Hot Cut trial during the first few months after the process is implemented. Based upon the level of demand, Verizon will be able to determine whether it is cost effective to implement a 'Smarts Clock' type interface. This Clock would be able to offer a specific actual due date at the time of ordering, rather than the maximum (35-business-day) due date.

Case: 02-C-1425
AT&T
Date of Request: November 26, 2003
Respondent: VZ Panel

ATT-VZ-167	Separately state, with respect to each of the three hot cut processes (basic, large job, and batch), answers to the following questions: (a) Is there an LSR that will support a hot cut when the existing service is Line Sharing? (b) Is there an LSR that will support a hot cut when the existing service is Line Splitting? (c) Please provide a web reference to the LSR that supports a hot cut when the existing service is Line Sharing. (d) Please provide a web reference to the LSR that supports a hot cut when the existing service is Line Splitting.

RESPONSE:

(a) No
(b) No
(c) See response to part (a)
(d) See response to part (b)

In addition, see response to ATT-VZ-168.

Case: 02-C-1425
AT&T
Date of Request: November 26, 2003
Respondent: VZ Panel

ATT-VZ-168	Verizon, in describing The Basic Hot Cut Process, which is a building block for the "Batch" Hot Cut Process, refers to Exhibit II-C. On Exhibit II-C and on Exhibit II-D used to describe the Proposed Batch Hot Cut Process , under a heading "End user wants move," there is a block that details CLEC interaction with the end user and reference to CSI to determine features and other information to facilitate negotiation with the end user.[1] (a) If upon reviewing CSI and discussion with the end user a CLEC learns that the existing Verizon customer has Line Sharing or Line Splitting, and wants voice service from a facilities based voice provider, what "LSR complying with existing Business Rules,"[2] should the CLEC utilize to effect this transaction with Verizon? (b) Will such a transaction be applicable to the Batch Hot Cut Process?

RESPONSE:

(a) Initially, we note that a Verizon retail voice customer would not have his or her DSL service provided through "Line Splitting." Also, we assume that "facilities based voice provider," as used in this interrogatory, refers to a switch-based provider utilizing Verizon-provided UNE-L, rather than a carrier utilizing its own switching and loop facilities. With those clarifications, Verizon states that such a migration is currently handled through the following process: (a) the data service would have to be disconnected; (b) a standard hot cut LSR would be submitted for the line; (c) after the hot cut, the facilities based voice provider would be free to install data service on the line. Verizon is currently investigating the feasibility of an alternative migration method for such lines that would not involve disconnecting the data service in situations in which the customer wishes to retain the same data provider, and in which the data provider and the new voice provider are willing to enter into a line splitting arrangement.

[1] Exhibit II-C and Exhibit II-D Verizon Initial Testimony
[2] *Ibid* @ Application Date

(b) The same process will be applicable to the Batch Hot Cut process.